

REMARKS

By this Amendment, claims 1 and 5 have been amended. Accordingly, claims 1-14 are currently pending in the application, of which claims 1 and 5 are independent claims. Applicants respectfully submit that the above amendments do not add new matter to the application and are fully supported by the specification.

Entry of this Amendment is respectfully requested because it places the present application in condition for allowance, or in the alternative, better form for appeal. In view of the above Amendments and the following Remarks, Applicants respectfully request reconsideration and timely withdrawal of the pending rejections for the reasons discussed below.

Interview Summary

Applicants thank Examiner Amini and Primary Examiner Bries for the courtesies extended during the telephone interview on March 11, 2005. During the interview, Applicants' representatives explained the distinguishing features between the claimed invention and the applied references. The interview is summarized below in the Remarks.

Rejections Under 35 U.S.C. §112, first paragraph

Claims 1-14 stand rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. Applicants respectfully traverse this rejection for at least the following reasons.

In particular, the Office Action rejected claims 1 -14 because the term "reflective," used in independent claims 1 and 5, does not appear in the specification. Applicants have amended claims 1 and 5 by replacing the term "reflective" with terminology well known to one with

reasonable skill in the art to more clearly set forth the subject matter of claims 1 and 5.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. §112, first paragraph rejection of claims 1-14.

Rejections Under 35 U.S.C. §103

Claims 1-14 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Japanese Patent Publication No. 09-050358 issued to Funakoshi (“Funakoshi”) in view of Japanese Patent Publication No. 08-129375 issued to Yamamura, *et al.* (“Yamamura”). Applicants respectfully traverse this rejection for at least the following reasons.

Funakoshi

Funakoshi is directed to a document processor and document editing method which accurately measures the distance between two points in a document on a display screen as would be produced when the document is printed. In operation, a user clicks and drags two pointers on a ruler displayed on the display screen to the two end-points of the distance to be measured in the displayed document. The displayed ruler has a digital readout window which reads out the distance between the two points as would be produced in a printed version of the document. Funakoshi also allows a displaying a document image in a size equivalent to a print image to be printed.

Thus, the Funakoshi device allows a user to use a ruler in a first image in a display screen to determine distances in a second image printed on paper, and allows a document to be displayed on a display screen at the same size as would be printed on a printer. Additionally, the Funakoshi device relates a distance measurement on a display screen to a distance on the page of

a printed document. However, the Funakoshi device simply relates dimensions from a display screen to a printed page, and does not operate on actual size information of subjects in an image. In other words, measuring a distance of an image on a display screen and converting the results to dimensions on a printed page does not utilize, convert or output information indicating an actual size of a subject in an image.

Applicants note that any size measurement done with the Funakoshi device is simply read out on the display screen, and no first image information is manipulated by an image converter to be outputted to any type of device whatsoever. Additionally, the Funakoshi device shows a first image of the document on a display screen, but produces a second image of the document on a printer instead of outputting second image information to a flat panel display. Accordingly, Funakoshi fails to show or suggest converting a first image information into second image information and outputting the second image information to a flat panel display unit, as set forth in claims 1 and 5.

Applicants also note that Funakoshi measures documents rather than subjects having an actual physical size. For example, a printer is capable of printing a document at any size, and thus there is no “actual size” to the printer’s output. Additionally, the Funakoshi device has no way of knowing the actual physical size of the subject displayed on the display screen or printed page. This is because the Funakoshi device is a document editing tool for translating page measurements in a display to a printed page which has nothing to do with processing actual subject size measurement information. Consequently, Funakoshi makes no mention of an actual physical size of a subject. Accordingly, Funakoshi fails to show or suggest wherein the first image information includes measurement information on an actual size of an object described by the first image, as set forth in claim 1. For the same reasons, Funakoshi fails to show or suggest

outputting first image information that includes measurement information on an actual size of a subject, as set forth in claim 5.

Funakoshi also fails to show or suggest first image information being converted into the second image information based on dot size information received from a flat panel display unit, as set forth in claims 1 and 5, because the second image of Funakoshi is produced on a printer rather than a flat panel display.

The Office Action asserts that the system of coordinates (x, y) of a pixel unit of Funakoshi is equivalent to dots as used in Applicants' claim language. However, Applicants' claims set forth dot size information, which is different from a (x, y) coordinate. Specifically, an (x, y) pair of a coordinate system describes a location and is dimensionless, while a dot size contains no position information but rather describes a length and has dimensions. In other words, a region between two points which is occupied by dots is also occupied by the spaces between the dots, and there is no necessary equivalency between coordinates and dot size. Furthermore, a coordinate position may be expressed in many different types of units including inches, millimeters, etc. Such units of measurement are independent of a dot size, and thus simply using a coordinate system to measure distances does not require any knowledge of dot size. Accordingly, coordinates (x, y) of a pixel unit as used in Funakoshi is different from dot size as used in the claims.

Yamamura

Applicants respectfully submit that Yamamura fails to cure the deficiencies of Funakoshi. In particular, the Yamamura device is directed to a video size corrector to enable the automatic display of videos at the same size without depending on display screen size. Thus, the

Yamamura device enables an image from a particular video source to be displayed at a constant size on various display screens regardless of the size of the display screen. The Yamamura device maintains a constant image size by determining the size of the image source by detecting a header and a footer of the image video signal for a scanned line, and measuring the amount of image data therebetween. A screen size selector is also detected to determine the size of the display screen. The size of the image source and the screen size selector are combined to create a correction factor which adjusts the size of the image to display the image at a constant size regardless of screen size.

Accordingly, Yamamura fails to show or suggest the first image information includes measurement information on an actual size of an object described by the first image information, as set forth in claim 1, or outputting first image information that includes measurement information on an actual size of a subject, as set forth in claim 5, because the Yamamura device works with source size rather than subject size information. As such, the Yamamura device contains no actual subject size information capability whatsoever.

Also, Yamamura fails to show or suggest first image information being converted into second image information based on dot size information, as set forth in claims 1 and 5, because the display screen information in Yamamura includes only the overall size of the screen rather than dot size information.

Applicants also respectfully submit that both Funakoshi and Yamamura fail to show or suggest a photographing unit for photographing an image of a subject, and outputting first image information that includes measurement information on an actual size of the subject, as set forth in claim 5. Funakoshi and Yamamura make no mention of a photographing unit, or receiving any information of any kind relating to the actual size of the subject. Additionally, Funakoshi

and Yamamura have no way of utilizing such information, and thus would have no need to receive subject size information.

The Office Action asserts that the step of image information based on dot size information received from a display unit is obvious. However, Funakoshi uses a ruler in a display to calculate a distance between coordinates. Such a calculation does not involve dot size, and Funakoshi makes no mention of the term “dot size.” Yamamura uses a screen size selector to determine the overall size of the screen. The overall size of screen does not necessarily determine dot size, and Yamamura makes no mention of the term “dot size.” Accordingly, neither Funakoshi nor Yamamura show or suggest utilizing dot size information to convert a first image to a second image.

The Office Action asserts that Funakoshi expresses the coordinates of a point P are (u, v) as P(u, v). The Office Action further asserts that in the case where these coordinates are the system of coordinates (u, v) of the real size unit on a print and display these on a CRT, they shall be changed into the system of coordinates (x, y) which make the pixel of the CRT a unit automatically. Applicants respectfully disagree and submit that such a system relies on measuring distances between two points as specified by their coordinates [either (u, v) or x, y]. As discussed above, such a method uses points on a surface which are dimensionless to calculate a distance rather than measuring an actual subject size using dot size, and thus the coordinates of Funakoshi are different from dot size.

For at least the reasons set forth above, neither Funakoshi or Yamamura, either alone or in combination, disclose or suggest the features of claims 1 and 5, and claims 1 and 5 are in allowable condition. Claims 2-4, and 6-14 are allowable at least for the reasons set forth above

with respect to claims 1 and 5, as well as for their added features. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. §103(a) rejection of claims 1-14.

Other Matters

Applicants note that claims 1 and 5 were also amended for informalities. Applicants further note that none of the claim amendments are made for the purpose of avoiding prior art or narrowing the claimed invention, and no change in claim scope is intended. Therefore Applicants do not intend to relinquish any subject matter by these amendments.

CONCLUSION

Applicants believe that a full and complete response has been made to the pending Office Action and respectfully submit that all of the stated objections and grounds for rejection have been overcome or rendered moot. Accordingly, Applicants respectfully submit that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicants' undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,



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